

# Exhibit C

IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF ILLINOIS  
EASTERN DIVISION

MICHAEL SAUNDERS,	)	
Plaintiff,	)	
v.	)	No. 12 C 9158
	)	
CITY OF CHICAGO, et al.,	)	Judge Robert M. Dow, Jr.
Defendants.	)	

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VINCENT THAMES,	)	
Plaintiff,	)	No. 12 C 9170
v.	)	
CITY OF CHICAGO, et al.,	)	Judge James B. Zagel
Defendants.	)	

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HAROLD RICHARDSON,	)	
Plaintiff,	)	No. 12 C 9184
v.	)	
CITY OF CHICAGO, et al.,	)	Judge Joan B. Gottschall

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IN THE CIRCUIT COURT OF COOK COUNTY, ILLINOIS  
COUNTY DEPARTMENT, LAW DIVISION

TERRELL SWIFT,	)	
Plaintiff,	)	No. 12 L 12995
v.	)	
CITY OF CHICAGO, et al.,	)	

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**DEFENDANT VALENTINI'S RESPONSE TO  
FIRST SET OF REQUESTS FOR PRODUCTION**

Defendant, Fabio Valentini, by and through his attorney, Anita Alvarez, Cook County State's Attorney, and her Assistants, Lisa M. Meador and Thomas E. Nowinski, respond to Plaintiff's First Requests For Production as follows:

1. All documents in the ASA Defendants' possession, custody, or control relating to any of the Plaintiffs – Harold Richardson, Michael Saunders, Vincent Thames, and Terrill Swift- and Jerry Pincher, with respect to the investigation and prosecution of Nina Glover's murder, including through and beyond the post-conviction proceedings and exonerations.

RESPONSE: Defendant objects to this request as overly broad, unduly burdensome, and

ambiguous. Subject to and without waiving these objections, Defendant states none.

2. Any organization chart in the ASA Defendants' possession that includes one or more Defendants and that identifies Defendants' chains of command from: November 1994 to November 1995.

RESPONSE: None.

3. Copies of any files maintained by the State's Attorney's Office that are in any of the ASA Defendants' possession, custody, or control relating to each of the ASA Defendants. Including personnel files, internal affairs files, and training records.

RESPONSE: Defendant objects to this request as overly broad, unduly burdensome, ambiguous, not limited in time or scope, and not likely to lead to admissible evidence.

4. All Documents relating to any Complaint alleging misconduct on the part of any of the ASA Defendants, including but not limited any lawsuits.

RESPONSE: Defendant objects to this request as overly broad, unduly burdensome, ambiguous, not limited in time or scope, and not likely to lead to admissible evidence. Subject to and without waiving these objections, Defendant states none.

Respectfully submitted,

ANITA ALVAREZ  
State's Attorney of Cook County

By: /s/ Lisa M. Meador  
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